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MAY 18 2015

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

UNITED STATES OF AMERICA

v.

GBENGA BENSON OGUNDELE,
a/k/a "Benson Ogundele,"
MUKHTAR DANJUMA HARUNA,
a/k/a "Mukhtar Haruna Danjuma,"
a/k/a "Mukky,"
VICTOR OYEWUMI OLOYEDE,
OLUSEGUN CHARLES OGUNSEYE,
a/k/a "Charles O. Ogunseye,"
BABATUNDE EMMANUEL POPOOLA,
a/k/a "Emmanuel Popoola,"
a/k/a "Tunde Popoola,"
ADEYINKA OLUBUNMI AWOLAJA,
JR.,
a/k/a "Yinka O. Awolaja, Jr.,"
MOJISOLA TINUOLA POPOOLA,
a/k/a "Mojisola Oluwakemi Tin
Popoola,"
a/k/a "Moji T. Popoola,"
OLUSOLA OLLA,
FUNMILAYO JOYCE SHODEKE,
a/k/a "Olufunmilayo Shodeke," and
OLUFEMI WILFRED WILLIAMS,
a/k/a "Wilfred Olufemi Williams,"
a/k/a "Femi Williams,"

Defendant.

CRIMINAL NO. PWG 15cr277

(Conspiracy to Commit Wire Fraud,
18 U.S.C. § 1349; Conspiracy to
Commit Money Laundering, 18 U.S.C.
§ 1956(h); Aggravated Identity Theft,
18 U.S.C. § 1028A; Forfeiture, 18
U.S.C. §§ 981(a)(1)(C) & 982(a)(1), 21
U.S.C. § 853, 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Wire Fraud Conspiracy)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. **GBENGE BENSON OGUNDELE**, a/k/a **"Benson Ogundele,"** (**"OGUNDELE"**) was a resident of Laurel, Maryland, and the owner, general manager, and member manager of Friendly Auto Sales and G.O. Benson Group LLC.
2. **MUKHTAR DANJUMA HARUNA**, a/k/a **"Mukhtar Haruna Danjuma,"** a/k/a **"Mukky,"** (**"HARUNA"**) was a citizen and resident of Nigeria.
3. **VICTOR OYEWUMI OLOYEDE** (**"OLOYEDE"**) was a resident of Laurel, Maryland, and the owner, general manager, and member manager of EAV Groups LLC and Crown Global LLC.
4. **OLUSEGUN CHARLES OGUNSEYE**, a/k/a **"Charles O. Ogunseye,"** (**"OGUNSEYE"**) was a resident of Laurel, Maryland.
5. **BABATUNDE EMMANUEL POPOOLA**, a/k/a **"Emmanuel Popoola,"** a/k/a **"Tunde Popoola,"** (**"B. POPOOLA"**) was a resident of Bowie, Maryland.
6. **ADEYINKA OLUBUNMI AWOLAJA, JR.,** (**"AWOLAJA"**) was a resident of New Carrollton, Maryland.
7. **MOJISOLA TINUOLA POPOOLA**, a/k/a **"Mojisola Oluwakemi Tin Popoola,"** a/k/a **"Moji T. Popoola,"** (**"M. POPOOLA"**) was a resident of Laurel, Maryland, and resided with **OGUNDELE**.
8. **OLUSOLA OLLA** (**"OLLA"**) was a resident of Greensboro, North Carolina.
9. **FUNMILAYO JOYCE SHODEKE** a/k/a **"Olufunmilayo Shodeke,"** (**"SHODEKE"**) was a resident of Burtsonville, Maryland.

10. **OLUFEMI WILFRED WILLIAMS, a/k/a “Wilfred Olufemi Williams,” a/k/a “Femi Williams,” (“WILLIAMS”)** was a resident of Ellicott City, Maryland.

The Drop Accounts

11. “Drop Accounts” are bank accounts opened or controlled by the defendants and their co-conspirators that are used to receive money from victims. The defendants and their co-conspirators opened at least the following Drop Accounts:

12. **OGUNDELE** opened the following Drop Accounts:

a. On or about August 10, 2009, **OGUNDELE** opened Bank of America account x2143 (“BOA x2143”) in the name of Friendly Auto Sales.

b. On or about October 24, 2012, **OGUNDELE** opened Bank of America account x7607 (“BOA x7607”) in the name of G.O. Benson Group LLC.

c. On or about December 30, 2012, **OGUNDELE** opened Wells Fargo account x4126 (“WF x4126”) in the name of G.O. Benson Group LLC.

d. On or about May 1, 2014, **OGUNDELE** opened Capital One account x9448 (“CO x9448”) in the name of G.O. Benson Group LLC.

13. **OLOYEDE** opened the following Drop Accounts:

a. On or about May 8, 2009, **OLOYEDE** opened Bank of America accounts x7699 (“BOA x7699”) and x7709 (“BOA x7709”) in the name of EAV Groups LLC.

b. On or about November 16, 2011, **OLOYEDE** opened Wells Fargo account x7321 (“WF x7321”) in his own name.

c. On or about November 19, 2012, **OLOYEDE** opened Capital One account x5256 (“CO x5256”) in the name of Crown Global LLC.

14. **OGUNSEYE** opened the following Drop Accounts:

- a. On or about June 24, 2009, **OGUNSEYE** opened Bank of America account x5410 ("BOA x5410") in the name Olusegun C. Ogunseye.
- b. On or about March 29, 2012, **OGUNSEYE** opened Bank of America account x1185 ("BOA x1185") in the name Olusegun C Ogunseye Sole Prop DBA Olusegun C Ogunseye Export.
15. On or about April 3, 2013, **AWOLAJA** opened Bank of America account x2097 ("BOA x2097") in the name DBA Yinka O Awolaja Jr, Kiski Entertainment, Adeyinka O Awolaja Sole Prop.
16. On or about September 30, 2009, **M. POPOOLA** opened Bank of America account x5641 ("BOA x5641") in the name Moji.T. Popoola.
17. On or about June 10, 2005, **OLLA** opened Wells Fargo account x6413 ("WF x6413") in the name Olusola Olla DBA Grace Auto.
18. On or about March 7, 2010, **SHODEKE** opened Bank of America account x6821 ("BOA x6821").
19. On or about October 9, 2008, **WILLIAMS** opened Wells Fargo account x4096 ("WF x4096").

The Victims

20. Victim A was a resident of Maryland.
21. Victim B was a resident of Ohio.
22. Victim C, Victim D, and Victim H were residents of Virginia.
23. Victim E was a resident of Oregon.
24. Victim F and Victim I were residents of North Carolina.
25. Victim G was a resident of Washington.

26. Victim J and Victim K were residents of Florida.
27. Victim L was a resident of Oklahoma.
28. Victim M and Victim N were residents of Tennessee.
29. Victim O was a resident of West Virginia.
30. Victim P was a resident of Michigan.
31. Victim Q was a resident of California.

The Conspiracy

32. Between in or about January 2011 and May 18, 2015, in the District of Maryland and elsewhere, the defendants,

**GBENGA BENSON OGUNDELE,
a/k/a "Benson Ogundele,"
MUKHTAR DANJUMA HARUNA,
a/k/a "Mukhtar Haruna Danjuma,"
a/k/a "Mukky,"
VICTOR OYEWUMI OLOYEDE,
OLUSEGUN CHARLES OGUNSEYE,
a/k/a "Charles O. Ogunseye,"
BABATUNDE EMMANUEL POPOOLA,
a/k/a "Emmanuel Popoola,"
a/k/a "Tunde Popoola,"
ADEYINKA OLUBUNMI AWOLAJA, JR.,
a/k/a "Yinka O. Awolaja, Jr.,"
MOJISOLA TINUOLA POPOOLA,
a/k/a "Mojisola Oluwakemi Tin Popoola,"
a/k/a "Moji T. Popoola,"
OLUSOLA OLLA,
FUNMILAYO JOYCE SHODEKE,
a/k/a "Olufunmilayo Shodeke," and
OLUFEMI WILFRED WILLIAMS,
a/k/a "Wilfred Olufemi Williams,"
a/k/a "Femi Williams,"**

did knowingly and willfully combine, conspire, confederate and agree with each other and other persons, known and unknown to the Grand Jury, to knowingly devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises (“the scheme to defraud”), and for the purpose of executing and attempting to execute the scheme to defraud did knowingly and willfully transmit and cause to be transmitted by means of wire communication, in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. § 1343.

Manner and Means of the Conspiracy and Scheme to Defraud

33. It was part of the conspiracy and scheme to defraud that the defendants and their co-conspirators searched online dating websites, including (among others) Match.com, Are You Interested (ayi.com), OkCupid.com, and Plentyoffish (pof.com), to initiate romantic relationships with elderly female and male individuals, including Victims A through Q (“the Victims”), for the purpose of obtaining money from the Victims.

34. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators used phone conversations, emails, internet chat messenger services, and text messages to form romantic relationships with the Victims.

35. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators used a number of false stories and promises to convince the Victims to deliver money to the members of the conspiracy, including, among others, fake hospital bills, fake plane trips to visit the Victims, fake problems with overseas businesses, and fake foreign taxes.

36. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators opened and/or managed the Drop Accounts in order to direct into and receive millions of dollars from the Victims.

37. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators caused the Victims to use the wires to transfer money to the Drop Accounts.

38. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators caused the Victims to deposit money directly into the Drop Accounts.

39. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators disbursed the money received from the Victims into the Drop Accounts by using wires to transfer money to other accounts, by initiating account transfers to other accounts at the same bank, by withdrawing sums of money, by obtaining cashier's checks, and by writing checks to other individuals or entities.

Overt Acts

40. In furtherance of the conspiracy, and to effect the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the District of Maryland and elsewhere:

a. On or about July 8, 2014, a co-conspirator who identified himself as "Jeremiah Reeds" caused Victim A to deposit \$5,000 at a Bank of America branch into BOA x5641, controlled by **M. POPOOLA**.

b. On or about July 23, 2014, a co-conspirator who identified himself as "Jeremiah Reeds" caused Victim A to deposit \$5,000 into BOA x1185, controlled by **OGUNSEYE**.

- c. On or about July 12, 2012, a co-conspirator who identified himself as “Mark Jelferson” caused Victim B to wire \$10,000 to BOA x7699, controlled by **OLOYEDE**.
- d. On or about July 25, 2012, a co-conspirator who identified himself as “Mark Jelferson” caused Victim B to wire \$8,000 to BOA x7699, controlled by **OLOYEDE**.
- e. On or about August 7, 2012, a co-conspirator who identified himself as “Mark Jelferson” caused Victim B to wire \$20,000 to BOA x2143, controlled by **OGUNDELE**.
- f. On or about December 19, 2013, a co-conspirator who identified himself as “Nick Ancelotti” caused Victim C to deposit \$6,000 into WF x6413, controlled by **OLLA**.
- g. On or about December 23, 2013, a co-conspirator who identified himself as “Nick Ancelotti” caused Victim C to deposit \$5,000 into WF x6413, controlled by **OLLA**.
- h. On or about May 20, 2014, a co-conspirator who identified himself as “Nick Ancelotti,” caused Victim C to wire \$15,000 to BOA x2097, controlled by **AWOLAJA**.
- i. On or about August 8, 2012, co-conspirators who identified themselves as “Ralph Luft” and “Mark Lawson” caused Victim D to deposit \$15,500 into BOA x7699, controlled by **OLOYEDE**.
- j. On or about November 13, 2012, co-conspirators who identified themselves as “Ralph Luft” and “Mark Lawson” caused Victim D to draw a \$12,000 cashier’s check that was later deposited into BOA x7607, controlled by **OGUNDELE**.
- k. On or about September 19, 2012, a co-conspirator who identified himself as “Daniel Gustafson” caused Victim E to wire \$5,000 to WF x4096, controlled by **WILLIAMS**.

l. On or about September 26, 2012, a co-conspirator who identified himself as “Daniel Gustafson” caused Victim E to wire \$4,500 to WF x4096, controlled by

WILLIAMS.

m. On or about October 16, 2012, a co-conspirator who identified himself as “Daniel Gustafson” caused Victim E to wire \$7,000 to BOA x7699, controlled by **OLOYEDE.**

n. On or about February 20, 2014, a co-conspirator who identified himself as “Bernard Walt” caused Victim F to deposit \$5,000 into WF x4126, controlled by **OGUNDELE.**

o. On or about February 28, 2014, a co-conspirator who identified himself as “Bernard Walt” caused Victim F to deposit \$7,000 into WF x4126, controlled by **OGUNDELE.**

p. On or about January 28, 2014, a co-conspirator who identified himself as “Justin Fallstrom” caused Victim G to deposit \$8,000 and \$4,600, at two different times, into WF x4126, controlled by **OGUNDELE.**

q. In or about 2013 and 2014, a co-conspirator who identified himself as “Justin Fallstrom” caused Victim G to attempt to deposit money into BOA x6821, controlled by **SHODEKE.**

r. On or about October 2, 2012, a co-conspirator who identified himself as “Josh Capinta” caused Victim H to deposit \$20,000 into BOA x7699, controlled by **OLOYEDE.**

s. On or about October 2, 2012, **B. POPOOLA** provided to **OLOYEDE** the bank account number of Individual Z, into which **OLOYEDE** then transferred \$10,000 from the BOA x7699 account into which Victim H had deposited money the same day.

t. On or about April 17, 2014, a co-conspirator caused Victim N to deposit \$2,600 into BOA x6821, controlled by **SHODEKE.**

u. On or about April 17, 2014, a co-conspirator caused Victim N to deposit \$1,720 into BOA x6821, controlled by **SHODEKE**, three hours later and at a different bank branch than the earlier deposit the same day.

18 U.S.C. § 1349

COUNT TWO
(Money Laundering Conspiracy)

The Grand Jury for the District of Maryland further charges that:

Introduction

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.

The Conspiracy

2. Between on or about January 1, 2011 and the present, in the District of Maryland and elsewhere, the defendants,

GBENGA BENSON OGUNDELE,
a/k/a “Benson Ogundele,”
MUKHTAR DANJUMA HARUNA,
a/k/a “Mukhtar Haruna Danjuma,”
a/k/a “Mukky,”
VICTOR OYEWUMI OLOYEDE,
OLUSEGUN CHARLES OGUNSEYE,
a/k/a “Charles O. Ogunseye,”
BABATUNDE EMMANUEL POPOOLA,
a/k/a “Emmanuel Popoola,”
a/k/a “Tunde Popoola,”
ADEYINKA OLUBUNMI AWOLAJA, JR.,
a/k/a “Yinka O. Awolaja, Jr.,”
MOJISOLA TINUOLA POPOOLA,
a/k/a “Mojisola Oluwakemi Tin Popoola,”
a/k/a “Moji T. Popoola,”
OLUSOLA OLLA,
FUNMILAYO JOYCE SHODEKE,
a/k/a “Olufunmilayo Shodeke,” and
OLUFEMI WILFRED WILLIAMS,
a/k/a “Wilfred Olufemi Williams,”
a/k/a “Femi Williams,”

did knowingly combine, conspire, and agree with each other, and others known and unknown to the Grand Jury to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity—to wit,

conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349—while knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and:

a. with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means

3. It was part of the conspiracy and scheme to defraud that the defendants and their co-conspirators opened and/or managed the Drop Accounts in order to receive millions of dollars into those accounts from the Victims.

4. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators caused the Victims to use the wires to transfer money to the Drop Accounts.

5. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators caused the Victims to deposit money directly into the Drop Accounts.

6. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators disbursed the money received from the Victims into the Drop Accounts by using wires to transfer money to other accounts, by initiating account transfers to other accounts at the same bank, by withdrawing sums of money, by obtaining cashier's checks, and by writing checks to other individuals or entities, all to promote wire fraud conspiracy and other

criminal conduct, and to hide true ownership and disguise the nature, source, and control of those assets.

Overt Acts

7. In furtherance of the conspiracy, and to effect the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the District of Maryland and elsewhere:

a. On or about March 1, 2012, after receiving a \$1,500 personal check deposit from Victim L, **OGUNSEYE** transferred \$6,100 from account BOA x5410, controlled by **OGUNSEYE**, to account BOA x2143, controlled by **OGUNDELE**.

b. On or about September 23, 2012, after receiving a \$5,000 wire transfer from Victim E, **WILLIAMS** made a Western Union money transfer for \$1,900, using a debit card associated with account WF x4096, controlled by **WILLIAMS**, to Individual X.

c. On or about September 24, 2012, after receiving a \$5,000 wire transfer from Victim E, **WILLIAMS** made a Western Union money transfer for \$1,900, using a debit card associated with account WF x4096, controlled by **WILLIAMS**, to Individual X.

d. On or about September 25, 2012, after receiving a \$23,000 wire transfer from Victim K, **OLOYEDE** transferred \$15,000 from account BOA x7699, controlled by **OLOYEDE**, to account BOA x2143, controlled by **OGUNDELE**.

e. On or about October 31, 2012, after receiving a \$10,000 wire transfer from Victim J, **OGUNDELE** transferred \$7,000 from account BOA x7607, controlled by **OGUNDELE**, to account BOA x 2143, also controlled by **OGUNDELE**.

f. On or about February 19, 2014, after receiving a cash deposit of \$9,500 from Victim M, **M. POPOOLA** wrote a check for \$9,500 payable to "G.O. Benson LLC" drawn

on account BOA x5641, which was deposited into account WF x4126, controlled by **OGUNDELE**.

g. On or about February 26, 2014, after receiving a transfer of 1,650,000 Nigerian naira from **OGUNDELE, HARUNA** completed an Internet Banking transfer of 205,000 Nigerian naira (approximately \$1,300) from Guaranty Trust Bank account x2977, an account held in Nigeria and controlled by **HARUNA**, to the Guaranty Trust Bank account of **B. POPOOLA**, with the remarks “via Internet Banking for biggy from **HARUNA, MUKHTAR DANJUMA** to **POPOOLA, BABATUNDE EMMANUEL**.”

h. On or about April 5, 2014, after receiving a \$30,000 cashier’s check from Victim I, **OLLA** wrote a \$28,855 check to **B. POPOOLA**.

i. On or about April 11, 2014, after receiving a \$28,855 check from **OLLA**, which represented fraud proceeds from Victim I, **B. POPOOLA** caused a \$20,000 check, drawn on a Wells Fargo Bank account, to be deposited to a Citibank bank account, controlled by Individual Y.

j. On or about May 20, 2014, after receiving a \$15,000 wire transfer from Victim C, **AWOLAJA** made a \$9,500 cash withdrawal from account BOA x2097, controlled by **AWOLAJA**.

k. On June 3, 2014, after receiving over \$25,000 in cash deposits from victims, including \$4,320 from Victim N, **SHODEKE** made a cash withdrawal of \$7,000 from BOA x6821, controlled by **SHODEKE**.

l. On June 4, 2014, **SHODEKE** made a cash withdrawal of \$5,000 from BOA x6821, controlled by **SHODEKE**.

m. On June 5, 2014, **SHODEKE** made a cash withdrawal of \$2,000 from BOA x6821, controlled by **SHODEKE**.

18 U.S.C. § 1956(h)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about December 10, 2012, in the District of Maryland and elsewhere, the defendants,

GBENGA BENSON OGUNDELE,
a/k/a “Benson Ogundele,” and
MUKHTAR DANJUMA HARUNA,
a/k/a “Mukhtar Haruna Danjuma,”
a/k/a “Mukky,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name, date of birth, and driver’s license number of Victim O—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT FOUR
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about June 1, 2012, in the District of Maryland and elsewhere, the

defendant,

MUKHTAR DANJUMA HARUNA,
a/k/a “Mukhtar Haruna Danjuma,”
a/k/a “Mukky,” and
VICTOR OYEWUMI OLOYEDE,

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and driver’s license number of Victim P—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT FIVE
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about February 28, 2012, in the District of Maryland and elsewhere, the defendant,

OLUSEGUN CHARLES OGUNSEYE,
a/k/a “Charles O. Ogunseye,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and bank account number of Victim L—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT SIX
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about October 2, 2012, in the District of Maryland and elsewhere, the
defendant,

VICTOR OYEWUMI OLOYEDE, and
BABATUNDE EMMANUEL POPOOLA,
a/k/a “Emmanuel Popoola,”
a/k/a “Tunde Popoola,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and bank account number of Individual Z—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT SEVEN
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about May 20, 2014, in the District of Maryland and elsewhere, the
defendant,

ADEYINKA OLUBUNMI AWOLAJA, JR.,
a/k/a “Yinka O. Awolaja, Jr.,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and bank account number of Victim C—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT EIGHT
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about December 17, 2013, in the District of Maryland and elsewhere, the defendant,

OLUSOLA OLLA,

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and bank account number of Victim C—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A

18 U.S.C. § 2

COUNT NINE
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about April 17, 2014, in the District of Maryland and elsewhere, the

defendant,

FUNMILAYO JOYCE SHODEKE,
a/k/a “Olufunmilayo Shodeke,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name of Victim N—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

COUNT TEN
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 31 and 33 through 40 of Count One are incorporated here.
2. On or about July 2, 2011, in the District of Maryland and elsewhere, the

defendant,

OLUFEMI WILFRED WILLIAMS,
a/k/a “Wilfred Olufemi Williams,”
a/k/a “Femi Williams,”

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person—to wit, the name and bank account number of Victim Q—during and in relation to conspiracy to commit wire fraud under 18 U.S.C. § 1349, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981 and 982(a)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' conviction on Counts One and Two of this Indictment.

Wire Fraud Forfeiture

2. As a result of the offense set forth in Count One, the defendants,

**GBENGA BENSON OGUNDELE,
a/k/a "Benson Ogundele,"
MUKHTAR DANJUMA HARUNA,
a/k/a "Mukhtar Haruna Danjuma,"
a/k/a "Mukky,"
VICTOR OYEWUMI OLOYEDE,
OLUSEGUN CHARLES OGUNSEYE,
a/k/a "Charles O. Ogunseye,"
BABATUNDE EMMANUEL POPOOLA,
a/k/a "Emmanuel Popoola,"
a/k/a "Tunde Popoola,"
ADEYINKA OLUBUNMI AWOLAJA, JR.,
a/k/a "Yinka O. Awolaja, Jr.,"
MOJISOLA TINUOLA POPOOLA,
a/k/a "Mojisola Oluwakemi Tin Popoola,"
a/k/a "Moji T. Popoola,"
OLUSOLA OLLA,
FUNMILAYO JOYCE SHODEKE,
a/k/a "Olufunmilayo Shodeke," and
OLUFEMI WILFRED WILLIAMS,
a/k/a "Wilfred Olufemi Williams,"
a/k/a "Femi Williams,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

Money Laundering Forfeiture

3. Upon conviction of the offense set forth in Count Two of this Indictment, the defendant,

GBENGA BENSON OGUNDELE,
a/k/a "Benson Ogundele,"
MUKHTAR DANJUMA HARUNA,
a/k/a "Mukhtar Haruna Danjuma,"
a/k/a "Mukky,"
VICTOR OYEWUMI OLOYEDE,
OLUSEGUN CHARLES OGUNSEYE,
a/k/a "Charles O. Ogunseye,"
BABATUNDE EMMANUEL POPOOLA,
a/k/a "Emmanuel Popoola,"
a/k/a "Tunde Popoola,"
ADEYINKA OLUBUNMI AWOLAJA, JR.,
a/k/a "Yinka O. Awolaja, Jr.,"
MOJISOLA TINUOLA POPOOLA,
a/k/a "Mojisola Oluwakemi Tin Popoola,"
a/k/a "Moji T. Popoola,"
OLUSOLA OLLA,
FUNMILAYO JOYCE SHODEKE,
a/k/a "Olufunmilayo Shodeke," and
OLUFEMI WILFRED WILLIAMS,
a/k/a "Wilfred Olufemi Williams,"
a/k/a "Femi Williams,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real and personal, involved in such offense, and any property traceable to such property.

Substitute Assets

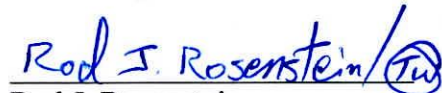
4. If, as a result of any act or omission of the defendant, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

18 U.S.C. § 981
18 U.S.C. § 982
21 U.S.C. § 853
28 U.S.C. § 2461(c)


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date: May 18, 2015